

MCDONALD CARANO
100 WEST LIBERTY STREET, TENTH FLOOR • RENO, NEVADA 89501
PHONE 775.788.2000 • FAX 775.788.2020

Douglas P. Baumstein (NYSBN 2863868)
Dominique N. Forrest (NYSBN 5335849)
White & Case LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
Email: dbaumstein@whitecase.com
Email: dominique.forrest@whitecase.com
(Lead Counsel)
(*Pro Hac Vice Application Forthcoming*)

Matthew C. Addison, Esq. (NSBN 4201)
Jessica Woelfel, Esq. (NSBN 11885)
Sarah Ferguson, Esq. (NSBN 14515)
McDonald Carano LLP
100 West Liberty Street, 10th Floor
Reno, NV 89501
Telephone: (775) 788-2000
Facsimile: (775) 788-2020
maddison@mcdonaldcarano.com
sferguson@mcdonaldcarano.com
(Local Counsel)

*Counsel for Defendants Ormat Technologies, Inc.,
Isaac Angel, and Doron Blachar*

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

MAC COSTAS, Individually and on
behalf of all other similarly situated.

Plaintiffs,

v.

ORMAT TECHNOLOGIES, INC.,
ISAAC ANGEL, and DORON
BLACHAR

Defendants.

No.: 3:18-cv-00271-RCJ-CBC

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT
(First Request)**

Pursuant to Local Civil Rule 6-1(a), Defendants Ormat Technologies, Inc., Isaac Angel,
and Doron Blachar ("Defendants"), Original Plaintiff Mac Costas, and Lead Plaintiff Movant

1 Phoenix Insurance Company, by and through their respective counsel of record, hereby stipulate
2 as follows:

3 WHEREAS, Original Plaintiff Mac Costas filed a Complaint against Defendants on June
4 11, 2018;

5 WHEREAS, Defendants currently have until October 11, 2018 to answer or respond to the
6 Complaint filed by Mac Costas;

7 WHEREAS, Lead Plaintiff Movant Phoenix Insurance Company filed a motion on August
8 10, 2018, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §
9 78(u)-4(a)(3)(D) for an order appointing Phoenix as Lead Plaintiff and approving Lead Plaintiff's
10 selection of Pomerantz LLP as Lead Counsel in the above captioned action;

11 WHEREAS, Phoenix Insurance Company purports to have the largest financial interest in
12 the litigation among lead plaintiff movants;

13 WHEREAS, all other lead plaintiff movants have withdrawn their applications to be
14 appointed as lead plaintiff;

15 WHEREAS, a Lead Plaintiff and Lead Counsel has not yet been appointed in this action;

16 WHEREAS, the parties anticipate that a consolidated amended complaint that will
17 supersede the Complaint will be filed by the Lead Plaintiff after its appointment;

18 WHEREAS, it would be wasteful and unnecessary to respond to the Complaint, which
19 will not be operative in this action;

20 WHEREAS, this is the first request for an extension to the response due date;

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
22 their respective counsel, without waiving any defenses that Defendants may have with respect to
23 service of process or jurisdiction, Defendants, Lead Plaintiff Movant Phoenix Insurance Company
24 and Original Plaintiff Mac Costas consent to the following schedule:

- 25 • The deadline to respond to the complaint is adjourned without date, with the
26 understanding that a response to the complaint may be rendered unnecessary by
27 the filing of a consolidated amended complaint.

- A consolidated amended complaint will be filed no later than 60 days after appointment of Lead Plaintiff and Lead Counsel.
- A motion to dismiss or other response will be filed no later than 60 days after service of the consolidated amended complaint.
- Plaintiffs' opposition to a motion to dismiss will be filed no later than 45 days after the motion to dismiss.
- Defendants' reply in support of a motion to dismiss will be filed no later than 30 days after Plaintiffs' opposition.

Dated this 9th day of October, 2018.

By: /s/ Matthew C. Addison for
Douglas P. Baumstein
Dominique N. Forrest
White & Case LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
dbaumstein@whitecase.com
dominique.forrest@whitecase.com

By: /s/ Daniel Sadeh
Daniel Sadeh
Bernstein Liebhard LLP
10 East 40th Street
New York, New York 10016
Telephone: (212) 779-1414
Facsimile: (212) 779-3218
dsadeh@bernlieb.com

Counsel for Mac Costas

(Pro Hac Vice Application Forthcoming)

Matthew Addison (NSBN 4201)
Jessica Woelfel (NSBN 11885)
Sarah Ferguson (NSBN 14515)
McDonald Carano LLP
100 W. Liberty Street Tenth Floor
Reno, Nevada 89501
Telephone: (775) 788-2000
Facsimile: (775) 788-2020
maddison@mcdonaldcarano.com
jwoelfel@mcdonaldcarano.com
sferguson@mcdonaldcarano.com

*Counsel for Ormat Technologies, Inc.,
Isaac Angel, Doron Blachar*

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1 By: /s/ Andrew R. Muehlbauer
2 Andrew R. Muehlbauer (NSBN 10161)
3 Sean P. Connel (NSBN 7311)
4 MUEHLBAUER LAW OFFICE, LTD.
5 7915 West Sahara Avenue, Suite 104
6 Las Vegas, NV 89117
7 Telephone: (702) 330-4505
8 Facsimile: (702) 825-0141
9 andrew@mlolegal.com
10 sean@mlolegal.com

11 Jeremy A. Lieberman (*admitted pro hac vice*)
12 J. Alexander Hood II (*admitted pro hac vice*)
13 POMERANTZ LLP
14 600 Third Avenue
15 New York, New York 10016
16 Telephone: (212) 661-1100
17 jalieberman@pomlaw.com
18 ahood@pomlaw.com

19 *Counsel for Phoenix Insurance Company*

IT IS SO ORDERED:



HONORABLE ROBERT C. JONES
UNITED STATES DISTRICT JUDGE
DISTRICT OF NEVADA

DATED: 10-24-2018

4819-4008-9976, v. 1